

Objective Criteria Review Memo *Impetro Resources LLC., Alice Seedorf Production Facility, Form 2A 402201254*

This summary explains how COGCC staff conducted its technical review of the Impetro Resources LLC (Impetro), Alice Seedorf Production Facility, Form 2A, Doc no 402201254 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for one Heater Treater, four oil tanks, two produced water tanks, one gunbarrel tank, one VOC combustor, and meets the following Objective Criteria:

1. (Criteria #5.c) The proposed Location lies within a Sensitive Area for water resources (within an area of potential shallow groundwater and proximity to surface water).

COGCC staff met with the Director to discuss the Objective Criteria for the Form 2A with the proposed Best Management Practices (BMPs) and applied Conditions of Approval (COAs). The following sections provide details regarding the evaluation of each criterion.

Criteria 5.c: Oil and Gas Locations within a Sensitive Area for water resources.

Site Specific Description of Applicability of Criteria 5.c: The Location is in a sensitive area due to its presence in the W-Y Basin and the Northern High Plain Aquifer Recharge Zone. Estimated depth to groundwater is 216 feet, based on water wells in the area.

Site Specific Measures to Address Criteria 5.c: Imptero has placed BMPs on the Form 2A for protection of the groundwater at the Location. BMPs include secondary containment of production equipment at the location, daily site visits for the detection of leaks, and general housekeeping and trash removal.

Summary: Imptero provided BMPs that address groundwater protections. The BMPs include engineering controls (construction and containment) and administrative controls (inspections).

Director Determination: Based on the Objective Criteria review. The Director has determined that this permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.